

**VIRGINIA:**

**IN THE CIRCUIT COURT FOR THE COUNTY OF SHENANDOAH**

MARGARET GEOGHEGAN,

Plaintiff,

v.

EASY MOVING, LLC

**Attn: Hennadiy Shevchenko, President**

**Serve through Secretary of Commonwealth**

and

HENNADIY SHEVCHENKO, a/k/a

SHEUCHENK HENNADIY,

**Serve through Secretary of Commonwealth**

Defendants.

Case No: CL 20-1398

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CIRCUIT COURT CLERK'S OFFICE  
SHENANDOAH COUNTY, VA  
SARONA S. IRVIN, CLERK  
D.C.

**COMPLAINT**

NOW COMES the Plaintiff, Margaret Geoghegan, and moves for judgment against the Defendants, Easy Moving, LLC and Hennadiy Shevchenko, a/k/a Sheuchenk Hennadiy, jointly and severally, on the grounds and in the amount set forth below:

1. Based upon information and belief, Easy Moving, LLC is a foreign limited liability corporation with its principal place of business in Bethlehem, Pennsylvania.
2. Based on information and belief and at all times relevant hereto, Defendant Hennadiy Shevchenko, a/k/a Sheuchenk Hennadiy ("Shevchenko") is an individual and citizen of the State of Pennsylvania, residing in Bethlehem, Pennsylvania.
3. At all times relevant hereto, Easy Moving, LLC was acting through its employees, agents, and assigns, including, but not limited to, Defendant Shevchenko.



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4. At all times relevant hereto, Defendant Shevchenko was an employee and agent of Easy Moving, LLC.

5. At all times relevant hereto, Defendant Shevchenko was acting within the course and scope of his employment with Easy Moving, LLC.

6. At all times relevant hereto, Easy Moving, LLC was vicariously liable for Shevchenko's actions and omissions.

7. On or about the 6<sup>th</sup> day of May, 2019, the Plaintiff, Margaret Geoghegan, was a passenger in a vehicle traveling southbound on Interstate 81, in Shenandoah County, in the Commonwealth of Virginia.

8. At that time and place, Defendant, Hennadiy Shevchenko, was operating a tractor and trailer and was traveling southbound on Interstate 81, in Shenandoah County, in the Commonwealth of Virginia.

9. At that time and place, it was the duty of the Defendant, Hennadiy Shevchenko to operate the tractor and trailer he was driving with reasonable care and with due regard for others using the road, including the Plaintiff, Margaret Geoghegan.

10. Notwithstanding said duties, the Defendant, Hennadiy Shevchenko, carelessly, recklessly, and negligently operated the tractor and trailer he was driving so that it collided with the vehicle in which the Plaintiff was a passenger, with great force and violence. The Defendant was negligent, including he:

- (a) failed to keep a proper lookout;
- (b) failed to operate the tractor and trailer he was driving in a safe manner;
- (c) failed to maintain proper control of the vehicle he was driving;
- (d) operated the tractor and trailer he was driving at an excessive rate of speed and in

excess of the posted speed limit;



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(e) struck the vehicle in which the Plaintiff was a passenger in the rear end causing the collision; and

(f) failed to follow the Rules of the Road.

11. Defendant, Hennadiy Shevchenko, was charged with Following Too Close in violation of Va. Code §46.2-816, and he pre-paid the fine.

12. As a direct and proximate result thereof, Plaintiff, Margaret Geoghegan, sustained damages, including but not limited to: property damage, serious and permanent injuries; has suffered and will continue to suffer great pain of body and mind; has sustained a loss of income and loss of earning capacity; has sustained permanent disability; has incurred and will incur in the future, hospital, doctors' and related bills in an effort to be cured of said injuries.

WHEREFORE, Plaintiff, Margaret Geoghegan, demands judgment against the Defendants, Easy Moving, LLC and Hennadiy Shevchenko, a/k/a Sheuchenk Hennadiy, jointly and severally, in the sum of **FOUR HUNDRED FIFTY THOUSAND DOLLARS (\$450,000.00)** plus interest and costs assessed as of the day of the accident referenced herein.

TRIAL BY JURY IS DEMANDED.

MARGARET GEOGHEGAN

By: \_\_\_\_\_

  
of Counsel



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